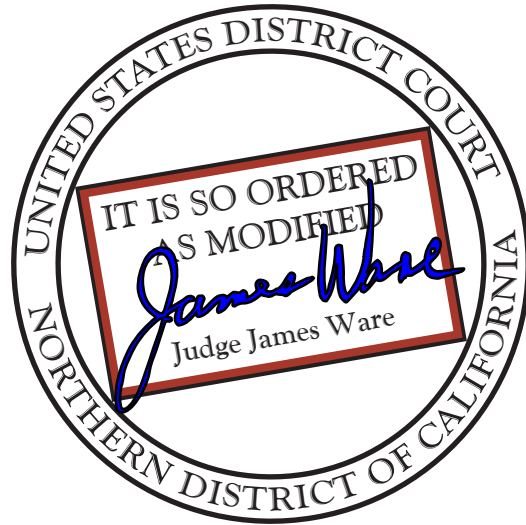


Geri Lynn Green, (State Bar No. 127709)  
 LAW OFFICES OF GERI LYNN GREEN<sub>LC</sub>  
 700 Montgomery Street  
 San Francisco, CA 94111  
 Telephone: (415) 982-2600  
 Facsimile: (415) 358-4562  
 Email: [gerigreen@earthlink.net](mailto:gerigreen@earthlink.net)

Attorneys for Plaintiffs  
 ESTHER KRENN and  
 ESTATE OF LUIS ANDREW MARTINEZ  
 By and Through his Administratrix, ESTHER  
 KRENN



IN THE UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

ESTHER KRENN and ESTATE OF LUIS  
 ANDREW MARTINEZ By and Through his  
 Administratrix, ESTHER KRENN

Plaintiffs,

vs.

COUNTY OF SANTA CLARA; SANTA CLARA  
 COUNTY SHERIFF'S DEPARTMENT (SCCSD);  
 SANTA CLARA DEPARTMENT OF  
 CORRECTION (DOC); SANTA CLARA VALLEY  
 HEALTH AND HOSPITAL SYSTEM (SCVHHS);  
 LAURIE SMITH; EDWARD FLORES; TOBY  
 WONG; KIM ROBERTS; ROBERT SILLEN;  
 MARYANN BARRY; DENISE BECKER;  
 CHRISTINE FERRY; BEVERLY PURDY;  
 AMARJIT GREWAL; N. MAGER;  
 CLASSIFICATION OFFICER DELA CRUZ, in  
 their official capacities and individually; and;  
 DOES I-XX in their official and individual  
 capacities,

Defendants.

) Case No. CV 07-02295 JW PVT  
 )  
 ) STIPULATION AND  
 ) [PROPOSED] ORDER TO ALLOW  
 ) PLAINTIFFS TO FILE A THIRD  
 ) AMENDED CIVIL RIGHTS  
 ) COMPLAINT ;  
 )  
 ) **AND ORDER CONTINUING**  
 ) **CASE MANAGEMENT**  
 ) **CONFERENCE**

1 respective counsel of record, hereby stipulate and agree to the filing of Plaintiffs'  
2 Proposed Third Amended Complaint (attached hereto) as of today's date: May 29, 2008.  
3 IT IS SO STIPULATED:

4 Dated: May 29, 2008

LAW OFFICES OF GERI LYNN GREEN, LC

5 By: /s/  
6 Geri Lynn Green, State Bar No. 127709  
7 Attorneys for Plaintiff

8 Dated: June 9, 2008

SANTA CLARA OFFICE OF THE COUNTY COUNSEL

9 By: /s/  
10 Gregory Joseph Sebastinelli  
11 David Michael Rollo  
12 Attorneys for Defendants


13 PURSUANT TO STIPULATION, IT IS SO ORDERED:

14 The Plaintiffs shall file their Third Amended Complaint as a separate docket entry on or  
15 before **June 20, 2008**.

16 In light of the parties' representations in the Joint Case Management Statement, the Court  
17 CONTINUES the Further Case Management Conference currently set for June 23, 2008 to  
18 **October 6, 2008 at 10 a.m.** On or before **September 26, 2008**, the parties shall file a Joint  
19 Case Management Statement, updating the Court on the status of their settlement efforts  
20 currently scheduled for a conference with Judge Seeborg on September 19, 2008.

21 The Court declines to make any further modification to the Scheduling Order issued on  
22 December 20, 2007. (See Docket Item No. 32.) The parties may renew their request for an  
23 extension of the case schedule at the October 6, 2008 conference.

24 Dated: June 17, 2008

25   
26 JAMES WARE  
27 United States District Judge  
28